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August 3, 2023

VIA ECF

District Court Judge Vernon S. Broderick Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Maas v. Verizon New York Inc.

Case No. 1:23-cv-4147(VSB)

Dear Judge Broderick:

We represent Verizon New York Inc. ("Defendant") in the above-referenced matter. We write, pursuant to Your Honor's Individual Rules, to respectfully request an adjournment of Defendant's responsive pleading deadline. Plaintiff consents to this request.

Defendant's time to file a responsive pleading currently expires on August 14, 2023. Defendant respectfully requests an extension through and including September 11, 2023. This extension will enable Defendant to fully investigate the allegations in the Complaint and discuss the allegations and other issues with Plaintiff's counsel prior to filing a response to the Complaint. This is Defendant's second request for an adjournment of its responsive pleading deadline and it does not impact any other deadline.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Howard M. Wexler

Howard M. Wexler

cc: All counsel of record (via ECF)

APPLICATION GRANTED SO ORDERED A SOURCE VERNON S. BRODERICK U.S.D.J. 08/04/2023

Extension is granted until September 11, 2023.